

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re: Bankruptcy No. 17-25132-CMB

MARY E. BLAZER Chapter 13
Debtor

MARY E. BLAZER Doc. No.
Movant Related to Claim 3
v.

CITIZENS BANK N.A.
RONDA J. WINNECOUR
Respondent(s)

OMNIBUS DECLARATION OF PLAN
SUFFICIENCY FOR MORTGAGE PAYMENT CHANGES

1. The mortgage loan held by the creditor named below is subject to payment fluctuations occurring more than twice per year. The debtor(s)' Chapter 13 Plan accommodates those payment fluctuations by providing for the payment of a set monthly amount to the creditor, designed to be at least, but not more than \$50 above, the average range of payment fluctuation over the preceding twelve (12) month period.

2. The debtor(s) hereby invokes excusal from the requirement to file amended plans and/or declarations as to the payment changes occurring during the plan term, as permitted by W.PA.LBR 3002-4(d).

3. The amount of the set monthly payment, and if applicable, the effective beginning date for that payment amount, is stated in the Chapter 13 Plan.

4. The amount of the set monthly payment has been calculated in the manner required by W.PA.LBR 3002-4(d)(1), and the calculation will be reviewed annually by the debtor pursuant to W.PA.LBR 3002-4(d)(2).

5. Contemporaneously with the filing of this declaration, the Chapter 13 Trustee and the affected creditor have been served with a copy of this declaration.

Name of creditor: Citizens Bank, N.A.

Court claim number: 3

MOYNIHAN LAW PC

Dated: December 2, 2020

By: /s/ Mark G. Moynihan
Mark G. Moynihan, Esquire
Attorney for Debtor(s)
PA 307622
2 Chatham Center, Suite 230
Pittsburgh, PA 15219
Phone: (412) 889-8535
Fax: (800) 997-8192
Email: mark@moynihanlaw.net